1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT TACOMA 8 BRETT GOSSETT, 9 NO. 3:20-cv-05639 Plaintiff, 10 VS. 11 NOTICE OF REMOVAL TO FEDERAL **COURT** PIERCE COUNTY AND PIERCE COUNTY 12 SHERIFF'S DEPARTMENT, AND DEPUTY MARC PETERSHAGEN, 13 Defendants. 14 15 TO THE CLERK OF THE ABOVE-ENTITLED COURT: 16 PLEASE TAKE NOTICE that Defendants Pierce County, "Pierce County Sheriff's 17 Department," and Deputy Marc Petershagen hereby remove to this Court the state court action 18 described below. 19 1. On April 27, 2020, an action was commenced in the Superior Court of the State of 20 Washington in and for the County of Pierce, entitled Brett Gossett vs. Pierce County, et al., as 21 cause number 20-2-05996-5. A copy of the complaint is hereto attached as Exhibit A. 22 2. The first date upon which Defendants Pierce County, "Pierce County Sheriff's 23 Department," and Deputy Marc Petershagen received a copy of the said complaint was June 11, 24

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2020, when Defendant Pierce County was served with a copy of the said complaint and a summons from the said state court. A copy of the summons is attached hereto as Exhibit B.

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. § 1441(a) in that it arises under 42 U.S.C. § 1983.

DATED this 1st day of July, 2020.

MARY E. ROBNETT Prosecuting Attorney

s/ KRISTAL M. COWGER

KRISTAL M. COWGER, WSBA # 43079 Pierce County Prosecutor / Civil 955 Tacoma Avenue South, Suite 301 Tacoma, WA 98402-2160 Ph: 253-798-4265 / Fax: 253-798-6713 kristal.cowger@piercecountywa.gov

CERTIFICATE OF SERVICE

On July 1, 2020, I hereby certify that I electronically filed the foregoing NOTICE OF REMOVAL TO FEDERAL COURT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Chalmers C. Johnson, WSBA #40180 LONGSHOT LAW, INC. PO Box 1575 Port Orchard, WA 98366

Phone: 425-999-0900

Email: chalmersjohnson@gmail.com

s/ CHRISTINA WOODCOCK

CHRISTINA WOODCOCK Legal Assistant Pierce County Prosecutor's Office Civil Division, Suite 301 955 Tacoma Avenue South Tacoma, WA 98402-2160

Ph: 253-798-7732 / Fax: 253-798-6713